

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	CIVIL NO.
)	JUDGE
\$56,490 UNITED STATES CURRENCY,)	
)	
Defendant.)	

VERIFIED COMPLAINT *IN REM*

The United States of America for its complaint against the Defendant Property alleges as follows:

NATURE OF THE ACTION

1. In this *in rem* civil action, the United States of America seeks forfeiture of \$56,490 United States currency (“Defendant Property”) pursuant to 21 U.S.C. § 881(a)(6), which authorizes forfeiture of monies or a thing of value furnished or intended to be furnished by any person in exchange for a controlled substance or it is proceeds traceable to such an exchange, or monies used or intended to be used to facilitate drug trafficking in violation of 21 U.S.C. § 801, et seq. including 21 U.S.C. § 841 and 21 U.S.C. § 846, and it is therefore subject to civil forfeiture pursuant to 21 U.S.C. § 881.

THE DEFENDANT *IN REM*

2. The Defendant Property was seized on March 9, 2022, at the Nashville International Airport.

3. The Defendant Property is presently in the custody of the United States Marshals Service.

JURISDICTION AND VENUE

4. Plaintiff brings this action *in rem* to forfeit and condemn the Defendant Property. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).

5. Venue is proper in the Middle District of Tennessee pursuant to 28 U.S.C. §§ 1355(b)(1) and 1395.

6. Pursuant to 21 U.S.C. § 881(h) and 18 U.S.C. § 981(f), all right, title and interest in the Defendant Property vests in the United States at the time of the acts giving rise to the forfeiture.

FACTS

7. The facts and circumstances supporting the forfeiture of the Defendant Property are contained in the Declaration of Drug Enforcement Administration Task Force Officer Christopher S. Burrell, a copy of which is attached hereto as Exhibit 1 and incorporated herein.

PRAYER FOR RELIEF

WHEREFORE, the United States of America prays that the Clerk issue a Warrant for Arrest *In Rem*, pursuant to Federal Rules of Civil Procedure, Supplemental Rule G(3)(b)(i), for the Defendant Property and Plaintiff will execute the warrant upon the Defendant Property pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

WHEREFORE, the United States of America prays that the Defendant Property be forfeited to the United States of America in accordance with the provisions of law; that notice of this action be given to all persons who reasonably appear to have an interest in the Defendant Property; that Plaintiff be awarded its costs in this action; and for such other necessary and equitable relief as this Court deems proper.

Respectfully submitted,

MARK H. WILDASIN
United States Attorney for the
Middle District of Tennessee

By: s/ J. Matthew Blackburn
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VERIFICATION

I, Christopher S. Burrell, Task Force Officer with the Drug Enforcement Administration, hereby verify and declare under penalty of perjury as provided by 28 U.S.C. § 1746, the following:

That I have read the foregoing Verified Complaint *In Rem* and know the contents thereof, and that the matters contained in the Verified Complaint are true to my own knowledge, except that those matters herein stated to be alleged on information and belief and as to those matters I believe them to be true.

The sources of my knowledge and information and the grounds of my belief are from information gathered by law enforcement officers, as well as my investigation of this case as a Task Force Officer with the Drug Enforcement Administration.

I hereby verify and declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

Executed this _____ day of September 2022 at Nashville, Tennessee.

Task Force Officer, Christopher S. Burrell
Drug Enforcement Administration